

FILED

**UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

**CHRIS SEVIER, LISA BOUCHER,
RICH PENKOSKI, GREG QUINLAND,
JOHN GUNTER JR.
(Plaintiffs)**

2018 MAY -9 P 3:27

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

V.

1-18 CV 550
Case No: No Jury Demand LMB/JFA

ROBERT MUELLER, in his official capacity as Special Counsel, JAMES COMEY, in his capacity as the former FBI director, ZAINAB AHMAD, in her official capacity at the Department Of Justice, GREG ANDRES, in his official capacity at the Department of Justice, RUSH ATKINSON, in his official capacity at the Department of Justice, RYAN DICKEY, in his official capacity at the Department of Justice, MICHAEL DREEBEN, in his official capacity at the Department of Justice, KYLE FREENY, in her official capacity at the Department of Justice, ANDREW GOLDSTEIN, in his official capacity at the Department of Justice, ADAM JED, in his official capacity at the Department of Justice, SCOTT MEISLER, in his official capacity at the Department of Justice, ELIZABETH PRELOGAR, in her official capacity at the Department of Justice, JAMES QUARLES, in her official capacity at the Department of Justice, JEANNIE RHEE, in her official capacity at the Department of Justice, BRIAN RICHARDSON, in his official capacity at the Department of Justice, BRANDON

VAN GRACK, in his official capacity at the Department of Justice, ANDREW WEISSMANN, in his official capacity at the Department of Justice, AARON ZEBLEY, in his official capacity at the Department of Justice, AARON ZELINSKY, in his official capacity at the Department of Justice LISA PAGE, in her official capacity at the Department Of Justice, PETER STRZOK, in his official capacity at the Department of Justice, DAN RICHMAN, in his capacity as an authorized FBI agent, KRISANN HODGES, in her official capacity at the Tennessee Board Of Professional Responsibility, JEFF BIVINS, Chief Justice of Tennessee Supreme Court in his official capacity (Defendants)

COMPLAINT FOR INJUNCTIVE RELIEF

Introduction

1. NOW COMES Chris Sevier Esq., a former rule of law Judge Advocate General, Pastor Richard Penkoski, former Navy servicemember and founder of Warriors For Christ, Lisa Boucher, a co-owner of WW Bridal, SGM John Gunter Jr., the founder of Clean Services Foundation, and Greg Quinlan, President of gardenstatefamilies.org, as taxpayers and lobbyist with the Special Forces Of Liberty based in Alexandria Virginia under the First Amendment Establishment Clause seeking an injunction against the members of all Special Counsel Mueller investigation into the fake Russian collusion matter brought against the Honorable President Donald Trump for non-secular reasons. The Mueller investigation is a non-secular sham that is creating the precedent that the government can dig into your life until it finds a crime. Quoting

John Dowd ““This isn’t some game. [The Special Counsel members] are screwing with the work of the president of the United States.” With North Korea, China, the Middle East and so much more, there is not much time to be thinking about this, especially since there was no Russian “Collusion.” The Honorable President Trump concisely summed up the nature of this sham investigation in a publication on social media that read:

"The Mueller probe should never have been started in that there was no collusion and there was no crime. It was based on fraudulent activities and a Fake Dossier paid for by Crooked Hillary and the DNC, and improperly used in FISA COURT for surveillance of my campaign. WITCH HUNT!"

2. This costly investigation has been going on for more than a year at the expense of the taxpayers costing more than \$20,000,000. As taxpayers, the Plaintiffs object and seeking preliminary and permanent injunction. The evidence is overwhelming that the investigation is rife with abuse of process, malicious prosecution, and Constitutional malpractice, constituting non-secular government action that fails at least two prongs of the *Lemon* Test and violates the Establishment Clause. All the Plaintiffs must show is that government action fails one prong of *Lemon*. The result of the investigation is that it has managed to (1) impeach the integrity of the Department of Justice and the FBI and (2) encroach on the President’s Article II powers, while demonstrating that Secular Humanists in office have proactively sought to create a two-tier system of justice based on selective morality, selective application of the law, abuse of process, and the false belief that the ends justify the means. While the investigation is very obviously a fake case, a “grudge match,” and a “gotcha ya” game that is predicated on the Russian proverb, “show me the man, and I will find you the crime,” there are very real collateral consequences that are harming the Plaintiffs, the Nation, and the world at large. The sham investigation has

relegated President Trump's supporters to second class citizens by not allowing the President they elected to fully be in control of his own department of justice. The Plaintiffs have suffered personal injury as a result. Most of the named Defendants are very obviously self-entitled Secular Humanist careerists, who care more about their personal aspirations than they do their duty to uphold the Constitution under Article VI. The Special Counsel's decision to weaponize the Department of Justice into a non-secular political vehicle constitutes an internal threat to National Security interests.

3. Respectfully, the problem with Attorney General Session, who has good intentions, is that he does not realize just how malicious and abusive the Department of Justice and parts of the justice system became under President Obama's destructive leadership. There is a lot of work that must be done by the Attorney General to undo eight years of abuse that remains ongoing and it starts with firing Defendant Rosenstein and Defendant Mueller for their pattern of abuse, malicious tactics, and unethical misconduct.

STANDING

4. The Establishment Clause of the United States Constitution is unique because taxpayers can move under it to stop the government from spending money on government action that has a non-secular motive. The Plaintiffs, through their taxpayer status and pursuant to the Establishment Clause, are respectfully moving this Honorable Court to enjoin an investigation that amounts to a non-secular sham that seeks to excessively entangle the government with the religion of Secular Humanism. The investigation involves an unconstitutional misuse of taxpayer dollars. The Plaintiffs have standing to enjoin the Special Counsel's investigation before the

Honorable Court in the Eastern District of Virginia under *Flast v. Cohen*, 392 U.S. 83 (1968).¹

The Plaintiffs have a logical nexus as taxpayers to seek an injunction because (1) they are working on tax legislation that substantially impacts the government's general fund substantially and the Plaintiffs do not want any of the tax dollars that they generate for the government to go towards non-secular government action advocated by the DNC; because (2) the Plaintiffs have been the subject of injurious persecution campaigns by government actors, like the State Defendants, and non-government actors, like the LGBTQ church, as a result of President Trump's lack of control over his Justice Department; (3) because the Plaintiffs are working on legislative matters that impact and benefit the Department of Justice but because President Trump is being prohibited from adequately overseeing his Department of Justice the Plaintiffs are being financially harmed as a result of a lack of responsiveness from DOJ; and because (4)

¹ For purposes of standing, the Plaintiffs have standing under their Establishment Clause claims as taxpayers under *Flast v. Cohen*, 392 U.S. 83 (1968) despite the plausibility of their self-asserted sex-based identity narrative. The general rules regarding standing to challenge governmental actions are designed to ensure that courts are addressing actual cases that can be resolved by the judicial system. However, in some circumstances, individuals may seek to challenge governmental actions for which neither those individuals nor any other individuals could meet standing requirements. Indeed, the Supreme Court has noted that in some instances "it can be argued that if [someone with a generalized grievance] is not permitted to litigate this issue, no one can do so." *United States v. Richardson*, 418 U.S. 166 (1974) Generally, the Court has noted, "lack of standing within the narrow confines of Art. III jurisdiction does not impair the right to assert [one's] views in the political forum or at the polls." However, the ability of individuals to affect change through political and democratic means does not eliminate all cases where a large group of individuals would be affected by the challenged governmental action. In particular, the Court has specifically allowed taxpayer standing for claims arising under the Establishment Clause. Under the *Flast* exception to the general prohibition on taxpayer standing, taxpayers may raise challenges of actions exceeding specific constitutional limitations (such as the Establishment Clause) taken by Congress under Article I's Taxing and Spending Clause which is applicable to the states under the Fourteenth Amendment. *Flast v. Cohen*, 392 U.S. 83 (1968). The Court has maintained its interpretation of this exception, refusing to extend it to permit taxpayer lawsuits challenging executive actions or taxpayer lawsuits challenging actions taken under powers other than taxing and spending. *Valley Forge Coll. v. Americans United*, 454 U.S. 464 (1982)(refusing to allow a taxpayer challenge of government transfer of property to a sectarian institution without charge because the action was taken by an executive agency exercising power under the Property Clause); *Hein v. Freedom from Religion Foundation*, 551 U.S. 587 (2007) (refusing to allow a taxpayer challenge of activities of the White House Office of Faith-Based and Community Initiatives because the funding was made through discretionary executive spending). These exceptions, the Court has explained, result because the Establishment Clause is a constitutional limit on the government's ability to act. According to the Court, the framers of the Constitution feared abuse of governmental power that might result in favoring "one religion over another." *Flast*, 392 U.S. at 103-04. It is difficult to imagine circumstances in which potential abuses of the Establishment Clause could be enforced without this exception.

the investigation communicates to everyone who voted for President Trump, which includes the Plaintiffs, that they are second class citizens whose vote is irrelevant in comparison to the religious ideals of Defendants' that were birth out of an imperialistic moral superiority complex. At all times, the Defendants have maliciously been doing the bidding of the DNC. The Plaintiffs are being personally injured as a result of the Special Counsel's sham witch hunt investigation, and they now seek a preliminary and permanent injunction.

5. Because the President is prohibited from fully overseeing his own Department of Justice, the Plaintiffs' legislative initiatives to (1) reduce human trafficking demand and protect children through the Human Trafficking And Child Exploitation Prevention Act,² to (2) undo legally endorsed, recognized, and enforced gay marriage policy and fake sexual orientation civil rights statutes through the Marriage And Constitution Restoration Act,³ to (3) defund planned parenthood under the Appropriating Life Act,⁴ to (4) cultivate an opt-out program from state sponsored sex education programs through the Parents Choice Act, and to (5) bring prayer back in school through a non-faculty sponsored opt-in program has been substantially impaired. Moreover, because President Trump is not at the helm of his Department of Justice, a litany of government organizations have been permitted to unlawfully persecute the Plaintiffs and other Trump supporters with impunity in an effort to prevent the Plaintiffs from forcing the State and Federal government to disentangle itself from policies that are unconstitutionally entangling the

² Senate Hearing on the Human Trafficking And Child Exploitation Prevention Act.
<https://youtu.be/R5pMRI6dhQA>; humantraffickingpreventionact.com

³ Marriage And Constitution Restoration Act
<https://youtu.be/dQnEg1LvGMI>

⁴ For the state and federal government to finance abortion violates the Establishment Clause because it excessively entangles the government with the religion of Secular Humanism.

government with the religion of Secular Humanism promoted by the DNC and the Defendants ad nauseam.

NATURE OF THE CASE

6. **RESOLVING THE TRAJECTORY OF THE FIRST AMENDMENT:** One of this Court's duties is to determine the trajectory of the First Amendment. The Plaintiffs are, respectfully, asking this Honorable Court to change the course of Constitutional law through the force of intellect alone in view of common sense arguments that accord with actual reality and transcultural truth by putting limitations on limitless investigations that lacks a secular goal. The Framers never intended for unaccountable partisan prosecutors to infringe upon the Article II powers of the President by allowing meritless investigations launched by devout Secular Humanists to hog tie the Commander in Chief for reasons that are implicitly religious and lack a primary secular purpose. Because (1) there is zero evidence of Russian collusion according to the April 27, 2018 Intelligence Committee Report from Congress, because (2) the Article II of the United States Constitution prohibits the President from being subpoenaed in a criminal matter, because (3) the President's legal advisors are prohibited by the rules of Professional conduct from allowing the President to be subjected a perjury trap interview, and (4) because the United States Court for the Eastern District of Virginia found on May 4, 2018 that the Special Counsel repeatedly lied to generate unfettered power to launch a fake case invalid ulterior motives, this Court cannot allow the taxpayer dollars to continue to be wasted on an never ending sham investigation that lacks a secular purpose and that has material collateral adverse impact on Trump supporters, to include the Plaintiffs. The taxpayers are the employ the Defendants and are the ultimate check and balance, and this Court has a duty to safeguard the

integrity of the Justice system by granting the Plaintiffs preliminary and permanent injunction demands so that the President and Nation are free from a destructive and dangerous distraction.

7. SECULAR HUMANISM IS A RELIGION FOR PURPOSES OF THE ESTABLISHMENT

CLAUSE: The First Amendment of the United States Constitution reads “[Government] shall make no law respecting an establishment of religion.” U.S. CONST. amend. I. The Framers never intended for the Establishment Clause prohibit the government from engaging in action that favored and endorsed institutionalized religions. They intended that the Establishment Clause also prevent the government from engaging in action that promoted and endorsed non-institutionalized religions as well. At present, “secularism” is having a full blown crisis because the evidence shows that there is hardly anything “secular” about it. The policy platforms advocated by the DNC and the Special Counsel are predicated on a series of unproven faith-based assumptions and naked assertions that are at the very least implicitly religious, if not pathetic excuses in an attempt to justify conduct that is objectively immoral.⁵

8. The Defendants in this action are devout Secular Humanists who are misusing their position in government in undertaking non-secular action that seeks to entangle the government with their religious dogma by scheming to remove a pro-Christian President from office through any means they can get away with. The Supreme Court and other Courts have already found that Secular

⁵ For example, the idea that (1) abortion is not murder is a faith based assumption, which means that the government cannot give taxpayer dollars to abortion clinics, like Planned Parenthood, through Title 10 funding or the Omnibus Bill without violating the Establishment Clause; the idea that (2) sexual orientation is based on immutability or genetics is a faith-based assumption that cannot be proven or disproven and, therefore, all sexual orientation discrimination statutes, transgender ordinances, gay marriage policies are prohibited from being enforced in view of the Establishment Clause because that are a sham that cultivates indefensible legal weapons against non-Secular Humanists; and the idea that (3) President Trump can be subjected to an endless sham investigation by devout Secular Humanist who feel that their private moral code is superior to the moral code that the President subscribes to is non-secular activity that excessively entangles the government with the religion of Secular Humanism and violates the Establishment Clause.

Humanism is a religion for the purposes of the Establishment Clause. *Torcaso v. Watkins*, 367 U.S. 488 (1961) and *Edwards v. Aguillard*, 482 U.S. 578 (1987) stating that “among religions in this country, which do not teach what would generally be considered a belief in the existence of God, are Buddhism, Toaism, Ethical Culture, Secular Humanism, and others.” See also *Washington Ethical Society v. District of Columbia*, 101 U.S. App. D.C. 371, 249 F.2d 127 (1957); 2 Encyclopaedia of the Social Sciences, 293; J. Archer, *Faiths Men Live By* 120—138, 254—313 (2d ed. revised by Purinton 1958); Stokes & Pfeffer, *supra*, n. 3, at 560. *Welsh v. U.S.*, 1970398 U.S. 333 (U.S. Cal. June 15); *Real Alternatives, Inc. v. Burwell*, 150 F. Supp. 3d 419, 440—41 (M.D. Pa. 2015), *aff’d sub nom. Real Alternatives, Inc. v. Sec’y Dep’t of Health & Human Servs.*, No. 16-1275, 2017 WL 3324690 (3d Cir. Aug. 4, 2017). Because most of the DNC’s party platforms is crafted to elevate Secular Humanism doctrine as the National Religion and because the Special Counsel is doing the bidding of the DNC, the investigation is flat out unconstitutional under the Establishment Clause.

9. Because the sham investigation is a calculated putsch that lacks a primary secular purposes and is substantially motivated by an implicitly religious objective to entangle the government with the religion of Secular Humanism, it fails *Lemon* and violates the Establishment Clause.⁶

10. ROSENSTEIN’S AND MUELLER’S MOTIVES ARE IMPLICITLY RELIGIOUS: The objectives of the implausible witch hunt are not secular because it is purposed to (1) invent a conviction, to (2) cultivate impeachment to self-justify the unchecked egos of devout supporters

⁶ Although the Supreme Court in *Church of the Holy Trinity v. United States*, 143 U.S.457 (1892) found that “America is a Christian Nation, Justice Kennedy attempted to establish that “America is a Secular Humanist Nation,” in *Parenthood of Southeastern Pa. v. Casey*, 505 U.S. 833, 84748 (1992) when he stated ““at the heart of liberty is the right to define one’s own concept of existence, of meaning, of the universe.” What Justice Kennedy was really saying was what the Defendants live by which was “to each his own,” which was what the sign over Buchenwald concentration camp read. A subscription to Secular Humanism is not just unwise, it is a worldview that has been behind most of the worst atrocities since the inception of mankind.

of Hillary Clinton, to (3) generate a persistent cloud of impropriety over an administration that has a different private moral code than the one shared by the egotistic investigators, and to (4) punish Trump supporters by relegating them to second class citizens because they did not vote Mrs. Clinton into office. That is, the Defendants are conducting a bad-faith investigation to maliciously prevent the President from adequately overseeing his own Department of Justice in an effort to advance the cult like Democratic party platform, which seeks to excessively entangle the government with the religion of Secular Humanism ad nauseum in a manner that is prohibited by the Establishment Clause.

11. EMOTIONAL CONSIDERATIONS DO NOT OVERRIDE THE ESTABLISHMENT CLAUSE. The sincerity of belief and irrelevant emotional feelings held by the Defendants concerning President Trump does not allow them to usurp the Establishment Clause and keep the sham investigation alive. *Holloman v. Harland*, 370 F.3 1252 (11th Cir. 2004). The Defendants, like Mrs. Clinton and the DNC, sincerely believe that their private moral code is superior and that if everyone would convert to their worldview, the world would be better off. But those emotional considerations do not save the sham investigation from surviving the instant Establishment Clause challenge which is not primarily motivated by a secular objective.

JURISDICTION

12. Jurisdiction is based on 28 U.S.C. § 1343 and 42 U.S.C. § 1983 for claims arising under the United States Constitution. Declaratory relief is authorized by 28 U.S.C. § 2201 and § 2202 and Rule 57 of the Federal Rules of Civil Procedure. Injunctive relief is authorized by the United States Code and Rule 65 of the Federal Rules of Civil Procedure. Plaintiffs move for costs and attorney's fees under 42 U.S.C. § 1988.

13. This Court has Federal Question jurisdiction under the First Amendment Establishment Clause, Fifth Amendment Equal Protection and Substantive Due Process Clauses, and the Fourteenth Amendment's Equal Protection and Substantive Due Process Clauses. The Defendants actions have violated the "Lemon" test and "coercion" test. *Lynch v. Donnelly*, 465 U.S. 668, 687-94 (1984)(lemon test), *Lee v. Weisman*, 505 U.S. 577 (1992); *School District v. Doe*, 530 U.S. 290 (2000); *County of Allegheny v. ACLU*, 492 U.S. 573 (1989)(coercion test); *McCreary Cnty, Ky. v. ACLU of Ky.*, 545 U.S. 844, 860 (2005); *Engel v. Vitale*, 370 U.S. 421, 431 (1962).

14.. This Court has jurisdiction over the parties and subject matter pursuant to 28 U.S.C. § 1331 and § 1367(a).

15. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b)(2) because the events or omissions giving rise to this action which harmed the Plaintiffs occurred in the Eastern District of Virginia. The Plaintiffs have been paying taxes, residing in Alexandria as they lobby in DC, while also working at the State Capitol with Delegates in Richmond, as they work to pass tax legislation that has an impact on both federal and state taxes. The false arrest of Mr. Manafort and his criminal trial that is the result of a Special Counsel that is acting outside of its jurisdiction occurred in this District and involves similar facts. A District Court in the Eastern District Of Virginia has already found that the investigation was brought for ulterior reasons and is operating without probable cause.⁷ This finding gives rise to a quasi-concurrent jurisdiction by this Court over these matters. The Plaintiffs have paid Federal and State taxes in this District. Furthermore, because Plaintiffs Sevier, Gunter, Penkoski, and Quinlan are involved in litigation in the District

⁷ Plaintiffs testifying before the Virginia House Juridicary Committee on HB 1592 in 2018 session.
<https://www.facebook.com/thisismystory.solutions/videos/771954102998576/UzpfSTE4NDk4OTkxNTgINzM3OTI6MjEyNDMzNjYwMTEzMDA0NQ/>

Of Columbia against four Democratic Congress members that has created a bias against the the Plaintiffs, this venue is proper. See *Sevier v. Lowenthal*, 1:17-cv-00570 (D.C. 2017). The Plaintiffs are all part of a chapter of the Special Forces Of Liberty that they started in Alexandria Virginia. The Plaintiffs and other have opened offices for the Special Forces of Liberty across the Country. Specialforcesofliberty.com.

16. The Court has jurisdiction over the Tennessee State Defendants because the injury that has resulted from their bad acts has been felt in the Eastern District because it has adversely impacted his efforts before the House Judiciary committee on matters relating to reducing Human Trafficking and Child Exploitation.

PARTIES

17. **PLAINTIFFS:** Chris Sevier Esq. is a former Army Officer and Rule of Law Judge Advocate General that worked with the Department of Justice and Department of Defends to uphold Constitutional integrity in Operation Iraqi Freedom only to realize that the United States under President Obama's destructive leadership was routinely operating against of the Constitution. Plaintiff Sevier is the authored of federal and state legislation and the target of countless sham witch hunt reprisal campaigns spearheaded by devout Secular Humanist government officials who oppose him simply because he is motivated to parallel policies off of the same Judeo Christian values that the County was founded upon because that moral code parallels self-evident morality, which makes the policies secular, neutral, natural, and a catalyst for immense human flourishing. Many State actors have criminally violated Plaintiff Sevier because they hate Christianity. Plaintiff Sevier has sought, but has not received, relief from the Department of Justice because President Trump is not in full control of DOJ, Mr. Rosenstein is. Plaintiff Sevier

is one of the founders of a lobbying firm called the Special Forces Of Liberty which focuses on Constitutional integrity that is located in Alexandria Virginia.

18. Lisa Boucher is a co-owner with her sister and her mother of WW Bridal in Pennsylvania, which was force closed by abusive LGBTQ activist is the wake of the Department of justice mishandling *United States v. Windsor*, 133 S. Ct. 2675, 186 L. Ed. 2d 808 (2013).⁸ The city council of Bloomsberg and the Pennsylvania legislature has been undertaking unconstitutional and coercive efforts to force Mrs. Boucher's bridal store to support an immoral and indecent lifestyle that erodes community standards of decency, degrades her services to couples who are entering into an actual marriage (not a parody one), and violates her religious beliefs. Mrs. Boucher sought but did not receive help from DOJ and other government entities before being forced to close in view of illegal threats directed at her and her family by LGBTQ activists. If President Trump was fully in control of his Department of Justice, Mrs. Boucher would not have felt compelled to close her family's bridal store in March 2018. Mrs. Boucher is a member of the Special Forces Of Liberty and is lobbying the Marriage And Constitution Restoration Act, which her story inspired.

19. Pastor Richard Penkoski is the founder of Warriors For Christ and Social Cross Media, which had a following of more than 225,000 followers on Facebook until Facebook removed the page because of Plaintiff Penkoski believes that gay marriage policies are immoral and subversive to community standards of decency. (See Declaration of Penkoski). Pastor Penkoski sought, but did not receive help from DOJ and other government entities for crimes committed against him and his family by devout Secular Humanists who share the same values as the DNC

⁸<https://townhall.com/notebook/bethbaumann/2018/03/07/christian-owned-bridal-shop-forced-to-close-over-death-threats-potential-new-lgb-n2458677>

and Special Counsel. Pastor Penkoski served in the Navy who is a member of the Special Forces Of Liberty and is lobbying the Marriage And Constitution Restoration Act.

20. John Gunter Jr. is the founder of Clean Services Foundation. He is a lobbyist for the Human Trafficking And Child Exploitation Prevention Act and other measures. Mr. Gunter is being financially harmed in pushing legislation that impacts DOJ because President Trump is being wrongfully prevented from controlling his justice department. Mr. Gunter has been threatened and attacked by Secular Humanists because of his religious beliefs, but Mr. Gunter is unable to get adequate relief from DOJ without President Trump being in full control of the Department of Justice. Mr. Gunter is a member of the Special Forces of Liberty.

21. Greg Quinlan is the founder of the Center For Garden State Families. Plaintiff Quinlan is being economically harmed in his lobbying efforts in fighting human trafficking, defunding Planned Parenthood, ending government endorsed parody marriage because President Trump is being prohibited from overseeing his Department of Justice. Plaintiff Quinlan is an ex-gay, who was radically transformed by Christianity, who has faced discrimination and persecution for making that case that the Fourteenth Amendment has nothing to do with informing the states how they must legally define marriage. Without President Trump being at the helm of his Department of Justice, Plaintiff Quinlan is deprived of equal protection under the law.

22. All of the Plaintiffs pay Federal tax of every kind to include sales tax in Virginia. While the Plaintiffs frequently work at the Capitol in the District Of Columbia, they are headquartered in Alexandria Virginia. All of the Plaintiffs are President Trump supporters who believe that an internal attack on the President is a direct attack on them personally. Under the transferred right of self-defense, the Plaintiffs, as taxpayers, are asking that the Court shut down an investigation

that is engaging in fraud, waste, and mismanagement because the investigation is hurting their Due Process Rights. All of the Plaintiffs have been harmed by the DOJ in wake of the Department of Justice's malicious mishandling of *United States v. Windsor*, 133 S. Ct. 2675, 186 L. Ed. 2d 808 (2013) putsch which led to the deeply flawed decision in *Obergefell v. Hodges*, 135 S.Ct. 2584 (2015) that compelled Scalia to call Secular Humanist in office a "threat to American Democracy." Attorney General Eric Holder was lying when said that the Fifth Amendment prevented him from defending DOMA § 3 in *United States v. Windsor*, 133 S. Ct. 2675, 186 L. Ed. 2d 808 (2013) because sexual orientation is a religious mythology and not a matter of genetics. The fraudulently obtained decision in *Windsor* was designed to lead to the dishonest decision in *Obergefell v. Hodges*, 135 S.Ct. 2584 (2015), which has caused the Plaintiffs to be victimized and injured. The corruption within the Obama Justice Department is the superseding cause of the Plaintiffs injuries, which cannot be remedied without President Trump being allowed to fully control his Department of Justice.

23. FEDERAL DEFENDANTS: Defendants Robert Mueller, Lisa Page, Peter Strzok, Zainab Ahmad, Greg Andres, Rush Atkinson, Ryan Dickey, Michael Dreeben, Kyle Freeny, Andrew Goldstein, Michael Dreeben, Adam Jed, Scott Meisler, Elizabeth Prelogar, James Quarles, Jeannie Rhee, Brian Richardson, Brandon Van Grack, Andrew Weismann, Aaron Zebley, and Aaron Zelinsky are employees of the Department of Justice, who make up the "Special Counsel." These individuals are sued in their official capacity. Thirteen members of Mueller's team are registered Democrats: Greg Andres, Rush Atkinson, Ryan Dickey, Michael Dreeben, Kyle Freeny, Andrew Goldstein, Adam Jed, Elizabeth Prelogar, James Quarles, Jeannie Rhee, Brandon Van Grack, Andrew Weissmann, and Aaron Zelinsky. Of these, eight have given

donations exclusively to Democrats: Andres, Atkinson, Freeny, Goldstein, Prelogar, Rhee, Van Grack, and Weissmann. Six of them have donated to Clinton specifically, or to a Clinton-aligned fund. It is questionable whether any of these individuals should even be allowed to work at the Department of Justice under the Trump administration.⁹ Their arrogant and abusive tactics have impeached the integrity of the Department of Justice beyond measure.

24. Defendant Jim Comey is the former director of the FB, and Defendant Dan Richman was commissioned as an authorized FBI actor. They both conspired to create a Special Counsel that lacked a secular purpose.

25. STATE DEFENDANTS: Krisann Hodges is a member of the Tennessee Board Of Professional Responsibility. She has used her office to target the Plaintiff Sevier and other Christian attorneys, for the same reason that Lois Lerner at the IRS targeted Christian conservative groups. Mrs. Hodges, like the Federal Defendants, sincerely believes that Secular Humanism is a superior religion to all others. She selectively enforces the rules of Professional Responsibility against attorneys who do not share the private moral code and digs in to Attorney's lives until she finds any reason that she can use to hurt them.

26. Jeff Bivins is the Chief Justice of the Tennessee Supreme Court. The Supreme Court oversees the dealings of the Tennessee Board Of Professional Responsibility and is vicariously liable for the unlawful and unconstitutional misconduct perpetrated by its agents, like Defendant Hodges. The Tennessee Supreme Court promulgated Supreme Court rule 9, which is

⁹ The Defendants have violated their duty owed to the Constitution under Article VI but conducting an unwarranted investigation that has exceeded the scope of its jurisdiction for reasons that are non-secular. The Defendants' investigation is reprisal against all of President Trump's supporters for refusing to vote for Secretary Clinton. The Defendants are bullies with a self-serving agenda. The Defendants fail to understand the objective difference between right and wrong, real and fake, secular and non-secular and therefore lack the character fitness to be in office. The Defendants serve as the poster child for the cultivation for a two-tier system of justice that the United States Constitution cannot tolerate.

unconstitutional under the Fourteenth Amendment because it shifts the burden onto the wrong party under the burden of proof and is being abused in a manner that violates the 6th Amendment.

27. The Plaintiffs have standing to sue the Federal Defendants and the Tennessee State Defendants in separate actions. However, the State Defendants' targeting of the Plaintiffs gives them even a greater logical nexus to seek a preliminary and permanent injunction against the Special Counsel. As the master of their complaint, the Plaintiffs believe that by consolidating a controversy involving a sham witch hunt investigation on the federal level and with a controversy concerning a sham witch hunt investigation on the state level will prove helpful to the Court, the President, the American public, while saving judicial economy. The American have the right to understand that these kinds of non-secular witch hunts take place all the time on micro and macro level.

28. Here is what the American public should know, if they vote Democrats in office, different state and federal agencies target Christians and people they simply do not like, through series of imperialistic power plays that are grounded in a moral superiority complex that is patently unconstitutional. When Democrats are in charge, all meaningful checks and balances dissolve, which ends up hurting all Americans in the long run regardless of their party affiliation. Large sectors of the Judiciary have become part of the anti-Trump resistance movement at the expense of their duty of loyalty owed to the United States Constitution under Article VI.

INTERESTED THIRD PARTIES

29. ATTORNEY GENERAL SESSIONS: Just as Army Officers, like Plaintiff Sevier, have a duty to only obey moral orders under Article 90 of the Uniform Code of Military Justice, the

Defendants are required under Article VI to only engage in Federal Action that does not violate the United States Constitution. Likewise, the Attorney General and the President also have the same obligation under Article VI to shut down an investigation that violates the Establishment Clause and that wrongfully encroaches on the President's Article II powers. Dr. Martin Luther King Jr. and Dietrich Bonhoeffer were correct in believing the underlying principle supporting Article VI that "silence in the face of immorality is itself an act of immorality." While the Plaintiffs are demanding that this Court immediately enjoin the Special investigation, the Plaintiffs also demand that Attorney General Jeff Sessions immediately comply with his duty under Article VI to end the non-secular investigation that is void of probable cause and is based on ulterior motives that are implicitly religious and violates the Establishment Clause. The Plaintiffs may file separate lawsuit against Attorney General Sessions in District Court of Alabama for dereliction of duty that could have the effect of interfering with the Presidents negotiations to denuclearizing the Korean. Attorney General Sessions should have seen this power play coming.

30. In accordance with the spirit of FRCP 68 and fair dealing, if Attorney General Sessions will immediately obey Article VI and uphold the Establishment Clause by force terminating the investigation and purging some of the members from the Department of Justice, the Plaintiffs may non-suit all claims against the members of the Department of Justice on these matters so that it can focus on real fights, like prosecuting MS 13 gang members who have violated the law.

31. PRESIDENT: The Justice Department is perhaps the most powerful government agency in this Country. It is outrageous that Defendant Rosenstein is basically running the Department of Justice. Therefore, it is unacceptable that the President of the United States is not in control of

his own Justice Department. The Plaintiffs and millions of Christian Americans have suffered immeasurably because of the Secular Humanists' stranglehold over the Department of Justice that continues to do the unconstitutional bidding of the DNC. Having been wrongfully targeted by different government actors while President Obama was in office, the Plaintiffs respectfully call upon the Honorable President and his legal advisors to (1) assume the worst about the Special Counsel intentions; to (2) recognize that the rules of professional conduct prohibit the President's attorneys from allowing the President to be subjected to a sham interview that is obviously a perjury trap, to (3) fire Defendant Rosenstein, Defendant Mueller, and Defendant Weismann for their continuous unconstitutional unethical misconduct that infringes upon the President's inherent Article II powers at the expense of the public's safety, health, and welfare. Make no mistake, the Plaintiffs are not appealing to the President and his advisors to honor Article VI and end the investigation just for the President's sake. No indeed! The Plaintiffs and the Country need the President to take control of his own Department of Justice so that it can be directed to prosecute bad federal and state actors like Mrs. Hodges of the Tennessee Board Of Responsibility, Wendy Soto of the Wyoming, Lois Lerner of the IRS, Mr. Comey, and Secretary of State Clinton, who have intentionally made a mockery of the rule of law by attempting to accomplish ends through unjustifiable measures that are harming the citizenry.¹⁰

TIMELINE OF FACTS

¹⁰ **FAMILY POLICY GROUPS:** The Plaintiffs invite family groups who have been harmed by any government actor due to a lack of accountability as a result of Secular Humanists in office to file *amicus* briefs and to file their own separate lawsuits to further help tear apart the Special Counsel. That is, the Plaintiffs encourage the American Family Association, Liberty Counsel, Family Research Council, the Heritage Foundation, the ACLJ, and Alliance Defending Freedom to file a similar lawsuit to this one, since they are also taxpayers, before other Federal Courts of competent jurisdiction to help crush this arrogant and non-secular witch hunt that is hurting our our President and constituting an escalating threat to American Democracy.

32. On Nov. 8, 2013, President Trump went to Russia to watch Miss Universe Pageant, which is a company that he owns. He stays overnight at the Ritz-Carlton. No collusion or irrelevant salacious activity occurred during this business trip.

33. March 6, 2016 George Papadopoulos was named a foreign-policy adviser by the campaign.

34. In May 2016, upon information and belief, during a night of drinking, Mr. Papadopoulos had a conversation with Australian High Commissioner to Great Britain Alexander Downer which had nothing to do with President Trump, his campaign, or his administration.

35. On May 26, 2016, President Trump won the Republican nomination, which had nothing to do with the red herring of Russia collusion misdirection.

36. On June 9, President Trump, Manafort, and Kushner met with Natalia Veselnitskaya who is a lawyer from Russia. To date the Special Counsel has not interviewed Mrs. Veselnitskaya in bad faith because the Special Counsel is not interested in the truth. It is only interest in accomplishing a egotistic non-secular agenda.

37. On June 20, 2016, Christopher Steele, an ex-British intelligence officer, working for Fusion GPS, who repeatedly admitted that he was “desperate” to prevent President Trump from serving as President, compiled the first of the 17 reports that became part of his impossible dossier of alleged contacts between the Trump campaign and Russian actors. The dossier was based on anonymous Russian sources because the sources did not exist. Mr. Steele maliciously fabricated bought and paid for dossier that was rife with false information and salacious allegations that were designed to embarrass the President and harm his political aspirations. The Steele dossier was bought and paid for by the Clinton administration, through Fusion GPS, which the Defendants knew or should have known. Mr. Steel waited until President Trump secured the

nomination to invent a fictional vehicle for the DNC to harm the President's candidacy as part of an unlawful ploy.

38. In early July 2016, Fusion GPS's contacted the FBI to provide them with the fictional, dirty, unverified dossier. The Defendants knew or should have known that the dossier was rife with false information and was bought and paid for by the Clinton campaign.

39. On July 22, 2016, WikiLeaks releases emails stolen from the Democratic National Committee. There is no evidence that President Trump or Russia had anything to do with providing Wikileaks with emails. The DNC was bitter about the email leaks and began looking for a scapegoat to blame shift.

40. On August 19, 2016, Mr. Manafort was fired from the Trump campaign for reasons that have nothing to do with the imaginary Russian collusion fiction.

41. Prior to election date in 2016, Defendant Struck mentioned an insurance policy to Andrew McCabe. The fake non-secular Russian probe is an insurance policy initiated in the wake of the Honorable President Trump taking office. On August 15, 2016, Defendant Strzok texted Defendant Page "I want to believe the path you threw out for consideration in Andy's office - that there's no way he gets elected - but I'm afraid we can't take that risk. It's like an insurance policy in the unlikely event you die before you're 40." The Strzok was indicating that the fake Russian investigation plan was a "predetermined" ploy to advance a non-secular cause, just as Mr. Comey had improperly "predetermined" not to prosecute former Secretary of State Clinton for her criminal misconduct early that year.

42. FBI IS DOING THE DNC'S BIDDING: On August 27, 2016, Senator Harry Reid sent a letter to James Comey urging him to open a Trump/Russia investigation. Senator Reid sent the

letter in bad faith knowing that there was no probable cause for President Trump to be investigated. The leadership at the FBI improperly elected to do the bidding of the DNC knowing that it was unprincipled political ploy that lacked a secular purpose.

43. On August 30, 2016, after the letter became public Peter Strzok texted Lisa Page, here we go: Harry Reid cites evidence of Russian Tampering in U.S. vote, and seeks F.B.I. inquiry.

<https://www.nytimes.com/2016/08/30/us/politics/harry-reid-russia-tampering-election-fbi.html>.

44. WRONGFULLY OBTAINED FISA WARRANT: In early October 2016, Mr. Steele met with the FBI in Rome to discuss his Clinton bought and paid for salacious dossier.

45. In October 2016, the Obama Justice Department and the FBI used the unverified salacious dossier to manipulate a FISA Court into issuing a surveillance warrant of a Trump campaign adviser, Mr. Page.

46. Although Mr. Page had given a lecture in Russia once during the campaign on unrelated matters, he did so outside of the scope and line as an agent of the Trump campaign and at no time ever engaged in unlawful acts of collusion with Russia. Before the FISA Court, the Defendants maliciously failed to disclose that the dossier was commissioned and paid for by the political campaign of Donald Trump's Democratic opponent, Mrs. Hillary Clinton. The Defendants intentionally failed to inform the FISA court that the dossier's author, Mr. Steele, told a senior Justice Department official that he was "desperate" to prevent Trump from being elected President.

47. Moreover, despite presenting dossier information as probable cause on four separate occasions — for the initial FISA warrant in October 2016, and three times in the ensuing months — the FBI intentionally failed to verify the dossier's explosive allegations and maliciously failed

to inform the court that its efforts to corroborate the allegations had been unavailing. The Defendants knew or should have known that Mr. Steele was the exclusive source of the dossier and that his dossier was rife with false information designed to accomplish the non-secular objective of harming President Trump's campaign and administration.

48. On October 21, 2016, the FISA court issued a warrant that was re-authorized three times thereafter, including twice while President Trump was in office. The FISA court primarily relied on the fabricated Clinton bought and paid for dossier in making its determination. Secular Humanists at the FBI wanted the FISA warrants so that they could spy on the Trump administration in search of a crime that would lead to impeachment.

49. According to the committee testimony of former FBI deputy director Andrew McCabe, the information in the dossier was necessary to the probable-cause showing required to justify issuance of a FISA warrant. That is, the warrant would not have been issued without the dossier information. Ten days after the warrant issued, Mr. Steele was suspended and then terminated as an informant for violating his agreement not to disclose his status as an FBI informant.

50. The FBI director Defendant Comey approved the first three warrants, and deputy director Andrew McCabe the last one; for the Justice Department, the warrant applications were approved by Deputy Attorneys General Sally Yates (of the Obama administration, presumably two times), Dana Boente (as "acting" DAG during the Trump administration), and Defendant Rosenstein (President Trump's appointed DAG). The FISA court was not informed that Steele was paid \$160,000 by the Clinton campaign and the DNC, through Fusion GPS and a law firm. Nor was mention made of his stated determination to prevent a Trump presidency.

52. COMEY'S CALCULATED PLOY: On Jan. 6, 2017, Defendant Comey attended a briefing at Trump Tower. Under the direction of Mr. Clapper, Defendant Comey told the President Trump about the dossier. Mr. Comey made notes of the meeting which were part of FBI work product. Mr. Comey knew that the President had the reasonable expectation that the meetings were confidential and classified.

53. On or around January 9, 2017, Mr. Clapper and others Defendants maliciously release the dossier to Mr. Tapper at CNN. On January 10, 2017, BuzzFeed, printed the entire dossier. The dossier was leaked to the media to harm and embarrass the President and to interfere with his ability to gain control over his own Department of Justice and to punish Trump supporters.

54. On Jan. 20, 2017, President Trump was inaugurated, which was more than the internal logic of many Secular Humanist, to include the Defendants, could bare. The Defendants consider Mr. Trump's victory a personal rebuke, which it was.

55. From Jan. 6, 2017 to April 11, 2017, President Trump and Defendant Comey meet either in person or by phone at least seven times. Defendant Comey took notes which were FBI work product.

56. On May 9, 2017, President Trump fired Defendant Comey at the recommendation of Attorney General Sessions and Defendant Rosenstein in accordance with the President's Article II powers because Defendant Comey has questionable judgment, questionable ethics, fails to understand the difference between right and wrong, and could not provide the President with an answer as to whether he was being investigated for the fake Russian collusion fiction. Defendant Comey was not giving President Trump the same treatment that he had given Mrs. Clinton. The

Defendants were outraged by Defendant Comey's directors termination because they have all made their careers in to an idol and because they have a pact to protect each other.

57. In the wake of his termination, Defendant Comey woke up in the night and realized that if he broke the law by leaking confidential and classified FBI work product and memos that were rife with false information for the same reason that the Steele dossier was that he could punish President Trump and his supporters for having the audacity to fire him because of his track record of self-dealing and untrustworthiness.

58. Defendant Comey provided Defendant Dan Richman, a Professor at Columbia University and authorized FBI actor, with four of seven memos with instructions to provide the memos to the media. All of the memos were FBI work product and two were marked "confidential" and two were marked "secret." Mr. Comey and the other Defendants knew that the documents were classified and that by providing them to the media they were intentionally breaking the law for non-secular reasons. Both Defendant Comey and Mr. Richman knew that they were breaking the law and plotting to cultivate a fictional basis to compel a non-secular investigation to be launched against President Trump that was founded on abuse of process and malicious prosecution. Yet, the Defendants all believe that because they came into office while President Obama was in office and because they are staunch Clinton supporters that they too were above the rule of law and untouchable. The Defendants treat the law more like a suggestion when it interferes with their goals.

59. MOTIVATED BY REVENGE: On or around May 16, 2017, at a meeting with Defendant Mueller and Defendant Rosentein, President Trump passed on giving Defendant Mueller the honor of serving as FBI director.

60. Defendant Mueller, Defendant Rosenstein, Defendant Comey, and others at DOJ elected to honor their pack to protecting each other at the expense of their duty to be faithful to the Constitution as required by Article VI and the oath they took when they entered office. The Defendants live by the creed “we protect our own” at the expense to their oath to uphold the Constitution. There are many people that Defendant Rosenstein could have appointed to Special Counsel, but he chose Defendant Mueller in bad faith because he is friends with Defendant Comey, and Defendant Rosenstein knew that he could count on Defendant Mueller to assemble a team that would be willing to engage in unconstitutional misconduct to accomplish ends that were non-secular. Defendant Rosenstein appointed Defendant Mueller in order to cover up his connection with Mrs. Clinton’s outrageous uranium one deal with the Kremlin.

61. On May 17, 2017, Defendant Rosenstein appointed Defendant Mueller to serve as Special Counsel as payback, giving Defendant Mueller carte blanche to dig into President Trump’s life until he found a crime or embarrassing information that could be basis for recommendations of impeachment in an effort to justify the egomania of fellow Secular Humanists who wanted Mrs. Clinton to be elected President so she could serve as their de facto priest and allow the DOJ to continue to operate without unfettered power, as President Obama encouraged.

62. Defendant Rosenstein and Defendant Mueller are careerists who care more about their self-serving aspirations than they do with honoring their duty to uphold the United States Constitution. The Defendants in this case are all guilty of following Mrs. Clinton’s leadership in making power and idol, while believing that their unwarranted sense of self-importance that is based on a moral superiority complex allows them to violate the law with impunity.

63. In becoming Special Counsel, Defendant Mueller maliciously formed a team of pro-Democratic bullies with axes to grind and animus towards President Trump and his supporters. All of Defendant Mueller's team are devout Secular Humanists, many of whom contributed substantially to Mrs. Clinton campaign because they hate candidates who do not believe in moral relativism and who have the humility and wisdom to believe in absolute truth. ¹¹

64. On October 30, 2017, the Special Counsel exceeded its jurisdiction and had Mr. Manafort arrested for matters that deal with Ukraine and in no way involves President Trump. The FBI raided Mr. Manafort's house at dawn and the Special Counsel intended to coerce Mr. Manafort into giving them any information - whether true or false - that they could use to take down the President of the United States. Currently, Mr. Manafort is being tried in an action within this same district in an action where the United States lacked the jurisdiction to make the arrest.

65. On April 9, 2018, the Special Counsel had the FBI arrest Mr. Cohen in an pre-dawn raid. The Special Counsel intends to trample on attorney-client privilege and force Mr. Cohen to provide the Special Counsel with any information - whether true or false - that can be used to accomplish their non-secular goal of taking down the President of the United States.

66. COMEY'S CONTRADICTED: On April 26, 2017, Defendant Comey stated that that the Clinton bought and paid unverified Steele dossier that made up the bulk of the FISA warrant to permit Secular Humanist Democrats to spy on the Trump campaign, did not make up the bulk of

¹¹ (See the text messages between Defendants Page and Strzok).(See Defendant Weismann's verifiable track record of withholding exculpatory evidence, putting innocent people in jail, and targeting companies without probable cause through abusive prosecutorial tactics to justify his own egomania and to cultivate self-promotion.) Defendant Mueller's maliciously former a team of prosecutors with conflicts of interests. Defendant Mueller's right-hand man, Defendant Aaron Zebley, was an attorney for Justin Cooper, the IT staffer who set up the Clinton's private email server and who destroyed the Clinton's Blackberries with a hammer. Defendant Zebley was Defendant Mueller's chief of staff at the FBI. Defendant Comey, Mr. McCabe, and Defendant Rosenstein aware of this. Defendant Mueller intentionally selected a team to investigate President Trump who he could count on to disregard the rules of ethics.

the FISA application. Two Congressional memos contradicted Defendant Comey's position because Defendant Comey's false statements were published in accordance with a long verifiable history of dishonesty.¹²

67. HOUSE INTELLIGENCE REPORT NO EVIDENCE OF COLLUSION IS THE SMOKING GUN TO COMPEL INJUNCTION: On April 27, 2018, the House Intelligence Committee released a highly redacted report that determined there was "no evidence that the Trump campaign colluded, coordinated, or conspired with the Russian government" during the 2016 election cycle and that the Clinton Campaign paid for Opposition Research obtained from Russia.¹³ On the same day, Attorney General Sessions admitted to Congress that the Special Investigation needed to come to a swift conclusion.

68. IMPLICATIONS OF QUESTIONS LEAKED TO NY TIMES: On or Around April 30, 2018, the New York Times published a series of proposed questions that the Special Counsel intended to ask President Trump that were leaked.¹⁴ The questions demonstrate that the investigation was nothing more than a "grudge match" and a "gotcha ya" game that has at all times lacked a secular purpose. Over all, the questions were irrelevant, poorly written, designed to embarrass the President and his supporters. The questions were maliciously crafted to set a perjury trap for the President. The questions demonstrate that the Special Counsel members are desperate to find any criminal act committed by President Trump to save face and to justify their

¹² Mr. Comey and Mr. Mueller are best friends, just like Mrs. Hodges and Mrs. Jones, the former director of the BPR, are best friends with the local Nashville Attorneys from Neal and Harwell that Plaintiff Sevier reported for a litany of unethical misconduct. Rosenstein, Mueller, Comey, Mrs. Hodges, the members of the Tennessee Supreme Court are implementing the same tactics of "we protect our own." However, these state and federal actors have a duty under Article VI of the United States Constitution to be faithful to that, not their like minded Secular Humanist friends.

¹³ Accordingly, the Robert Mueller special counsel investigation has now far exceeded its jurisdiction, just as was planned all along.

¹⁴ <https://www.nytimes.com/2018/04/30/us/politics/questions-mueller-wants-to-ask-trump-russia.html>

waste of taxpayer dollars. Professor Dershowitz characterization of the questions was factually correct. The questions were inartfully drawn, open ended, and not sharp cross examination questions. The questions were obviously designed to invite President Trump to ramble, which is the strategy of the Special Counsel, in an effort to lay down a perjury trap. If the Special Counsel were to ask questions to which he could answer “yes” or “no,” it would not give them the advantage that they are seeking to accomplish non-secular ends.¹⁵

69. ROSENSTEIN THINKS THAT OBEYING THE CONSTITUTION IS EXTORTION: On May 1, 2018, Defendant Rosenstein displayed his jaded self-entitlement syndrome by calling Congress’s demand that he comply with his duty hand over documents that relate to a sham investigation that he arrange as “extortion.” Like Congress, the Plaintiffs are demanding before this Court that the Defendants comply with the Establishment Clause by the issuance of a temporary and permanent injunction. The Plaintiffs’ demand for Constitutional compliance Defendant Rosenstein and the Special Counsel is not “extortion.”

70. A FEDERAL COURT CALLS “A SPADE” “A SPADE:” On May 4, 2018, the Federal District Court for the Eastern District of Virginia found during a hearing for ex-Trump campaign chairman Paul Manafort that the Defendants named here lied about the scope of the investigation to obtain “unfettered power” and that the Defendants are more interested in bringing down the President than any other consideration.

¹⁵ Former United States Attorney Joe diGenova’s assessment of the questions was factually accurate. The questions constituted direct evidence of intrusion into the President’s Article II powers under the Constitution to fire any branch employee. To ask questions, as Defendant Mueller proposes to do, about what the President was thinking when he fire Defendant Comey or Mr. Flynn, or anybody else is an outrageous, sophomoric, juvenile intrusion into the President’s unfetter power to fire anyone in the executive branch. It is a symptom of how ridiculous the Special Counsel appointment by Defendant Rosenstein with no evidence of a crime has been at all times. All of the questions about what the President “thinks” has reduced the Special Investigation into the “thought police” that lacks a secular purpose. The questions were supposed to deal with Russian collusion but instead concerned the President’s thought patterns. (While it is not a crime to think differently about policy than the Special Counsel members, it is unconstitutional for the Defendants to conduct a non-secular witch hunt.)

HOUSE RESOLUTION TO END THE INVESTIGATION

71. On May 4, 2018, Congressman Todd Rokita introduced a resolution requiring that the Special Investigation be dissolved for lacking probable cause.¹⁶ (The injunction that the Plaintiffs seek would provide the sponsor of the resolution the relief he seeks without wasting any more of the taxpayers dollars.)

72. ABUSE OF PROCESS AND MALICIOUS PROSECUTION: From the being of the investigation until now, the sham investigation has cost the taxpayers millions of dollars while failing to produce any evidence of Russian collusion. Although Mr. Flynn and Mr. Padopoulos felt compelled to plead guilty to the crime of lying to the FBI, those convictions were the result of extortionist tactics and have nothing to do with Russian collusion and involve mal prohibitum. The Special Counsel's decision to arrest Mr. Cohen and Mr. Manafort for white collar violations in dramatic fashion was a form of dangerous political theater that erodes the legitimacy of attorney-client privilege. Like Mrs. Clinton, the Defendants believe that the rule of law does not apply to them because of who they are. The Special Counsel knows that Stormy Daniels, a former porn star, has nothing to do with the scope and line of the Russian investigation. The Defendants know that the arrest of Mr. Cohen was conducted in bad-faith with the ulterior purpose of embarrassing and delegitimizing the President, punishing his supporters, and marginalizing the Republican party for not promoting the religious worldview held by the Defendants.

73. PRESIDENT TRUMP'S UNSURPASSED ACCOMPLISHMENTS: Despite being subjected to a sham investigation for over year, President Trump has managed to accomplish

¹⁶ <https://rokita.house.gov/sites/rokita.house.gov/files/RESOLUTION-5-3-2018.pdf>

more than any President in his first year than any President since the inception of the United States.¹⁷ Nevertheless, the fact the President Trump is being prohibited from overseeing his Department of Justice is harmful.

74. THE TOUGH ON RUSSIA FACTOR: No President before President Trump has been tougher on Russia. See the use of the Military in Syria, the aluminum tariffs, the 60 diplomats sent out by the President's actions). The Honorable President is the leader of the free world. The evidence suggests that the fake investigation is having the real world consequence of compelling the President to be harsher on Russian than might otherwise be necessary. This is more reason for the Court to enjoin the fake investigation that has real consequences for humanity. It is objectively immoral for the Defendants to pressure the President of the United States in a manner that could cause him to be harsher on Russia than necessary. (The evidence shows that the Defendants' monumental arrogance has cause them to have blood on their hands in Syria.)

¹⁷ Here are a fraction of the Honorable President's unprecedented accomplishments: Stock Market reached an all-time high; Consumer confidence at 17-year high; More than 2 million jobs created; Mortgage applications for new homes rise to a 7-year high Unemployment rate at 17-year low; Signed the Promoting Women In Entrepreneurship Act; Gutted Obama-era regulations; Ended war on coal; Weakened Dodd-Frank regulations; Promoted buying and hiring American; Investment from major businesses (FoxConn, Toyota, Ford and others); Reduced illegal immigration; Bids for Border Wall underway; Fighting back against sanctuary cities; Created Victims of Immigration Crime Engagement Office Changed rules of engagement against ISIS; Drafted plans to defeat ISIS; Worked to reduce F-35 cost; 5-year lobbying ban; Sanctioned Iran over missile program; Responded to Syria's use of chemical weapons; Introduced tax reform plan Renegotiating NAFTA; Withdrew from the Trans-Pacific Partnership (TPP); Removed The United States out of The Paris Accord; Created task force to reduce crime; DOJ targeting MS-13; Signed an Executive Order to promote energy independence and economic growth; Signed Executive Order to protect police officers; Signed Executive Order to target drug cartels; Signed Executive Order for religious freedom; Sending education back to The States; Fixing the Department of Veterans Affairs SCOTUS upheld parts of President Trump's temporary travel ban Executive Order; Authorized the construction of The Keystone Pipeline; Created commission on opioid addiction; Combating human trafficking (both EO and action); Rollback of Obama's Cuba policy; Food Stamp use lowest level in 7 years; Reduced White House payroll; Donating Presidential Salary; Executive Order on Obamacare subsidies; Would not certify the Iran Nuclear Deal; Successful trip to Asia; Signed trade deal with China; Designated North Korea a terrorist state; ISIS lost virtually all of its territory; Recognized Jerusalem as Israel's capital; Passage of Tax Reform Bill; Signed 130 bills into law; Made 136 Presidential Proclamations; Signed 64 Executive Orders;

75. THE SHAM INVESTIGATION SHOULD BE ENJOINED BECAUSE IT HAS PROVEN THAT THE UNITED STATES HAS A TWO TIER SYSTEM OF JUSTICE:

Under President Obama, government actors on the federal and state level have been permitted to target individuals simply because they have a different worldview than they possess. This is why it is vital that President Trump be permitted to immediately take over his Department of Justice and the Defendants be enjoined by the Courts.

76. The fake investigation against the President involves a scenario where the Democrats are hypocritically accusing the President of the very crime their party members have perpetrated. The investigation is per se misdirection and red herring that lacks a secular purpose and fails the *Lemon* and coercion test while eroding the Due Process Rights of Trump Supporters under the Fifth Amendment.¹⁸

77. The only unlawful collusion that has taken place was between the DNC and the Russians. The DNC simply accused President Trump of the very crime its agents actually committed. The DNC refused to hand over their servers to the FBI. The FBI under the direction of the Special Counsel has broken down doors to seize Paul Manafort and Michael Cohen early in the morning to create political theater, and yet, when they approached the DNC about providing servers and DNC refuses to hand over the servers, the Department of Justice was fine with it. That is evidence of a non-secular fix.

78. TWO TIER SYSTEM OF JUSTICE: The only meaningful thing that the Special Counsel has proved is that there is a two tier system of justice in the United States at present - one for elitist Secular Humanists and one for everyone else. The DOJ's interview with Hillary Clinton's

¹⁸ This is precisely the strategy that was used by the Tennessee State defendants. Plaintiff Sevier reported a well liked attorney to the BRP, Bill Ramsey of Neal and Harwell, for unethical misconduct and the BPR turned around and accused Plaintiff Sevier of violations to cover for the Attorney they had a working relationship with.

concerning her criminal misconduct was not taken under oath, recorded, or transcribed. Her exoneration was written months in advance by Defendant Comey who has praised Mrs. Clinton in public and criticized the Honorable President Trump. Defendant Strzok oversaw Mrs. Clinton's interview, who is an ardent Secular Humanist who favored Hillary Clinton, and who hates President Trump. In text messages between Defendant Strzok and Lisa Page, two members who became part of the Mueller team, Defendant Strzok called the Honorable President Trump an idiot, menace, and lonesome human being because he has a different religious and philosophical worldview than they have. In one text Defendant Strzok stated "F\$@& Trump." Because of the infiltration of Secular Humanist in office, there is no longer equal justice under the law and equal application of the law. While the President is targeted by the Department of Justice for non-secular reasons, Hillary Clinton, Andrew McCabe, and Defendant Comey have committed actual crimes with impunity simply because they subscribe to the latest version of Secular Humanism. Mrs. Clinton could be charged with 18 USC § 793 (D, E, and F) for mishandling and destroying classified documents; 18 USC § 1924; 18 USC § 641; 18 USC § 2071 (B); and 18 USC § 1505 to obstruction of justice for the bleachbit, busting up devices with hammers. Defendant Comey should be prosecuted under 18 USC § 1505, 18 USC § 1515(b), 18 USC § 641 after taking his Trump memos outside of the FBI and leaked them, 18 USC § 793, 18 USC § 1924(A). When Mr. Comey lied to Congress about not signing off on Mrs. Clinton's exoneration letter prior the conclusion of the investigation, he violated 18 USC § 1621 and 18 USC § 1001. Mr. McCabe lied to the FBI and was fired because of it. He should be prosecuted under 18 USC § 1001, 18 USC § 1621, and 18 USC § 1505. The Special Counsel's efforts to see

President Trump discredited and removed from office because he has a different religious and philosophical worldview than they do.

79. At the very least, Defendant Comey should be prosecuted for leaking classified information that was intended to produce the appoint of a Special Prosecutor which has cost the taxpayers millions of dollars, relegated Trump supporters to second class citizens, and harmed the electorate by preventing the President to control his own Department of Justice. The Plaintiffs can appreciate a mercy sentric Department of Justice. It is one thing is information is released and no one is harmed. But the entire Country has been harmed by the sham investigation because of the Defendants' schemes. On balance, the Plaintiffs have standing in this case to enjoin a fake federal investigation because they have been harmed by a fake state investigation that has been permitted to take place because President Trump is not in control of his Department of Justice.

FACTS REGARDING THE STATE DEFENDANTS

80. Like the President, the Plaintiffs have been the subject to their own witch hunt investigations for reasons that are non-secular. Plaintiffs Gunter, Penkoski, Boucher, and Quinlan have asked Plaintiff Sevier to represent them in pro-Christian litigation as parties against government actors who have violated their Constitutional rights. However, Plaintiff Sevier is currently not able to do so adequately because the Tennessee Board of Professional Responsibility and the Tennessee Supreme Court have maliciously hatched a witch hunt of their own for non-secular reasons to punish Plaintiff Sevier for being a whistleblower and for promoting policies that are oppositional to their Secular Humanist doctrine. The State Defendants targeting lacks a secular purposes.

81. In May 2009, Plaintiff Sevier reported prominent attorneys who represented Celebrity Apprentice winner John Rich, to the BPR for a stream of unethical misconduct. (See *Severe Records et. al. v. Rich et. al.*, 09–6175 (6th Cir. 2011)). Because Mr. Rich’s attorneys were connected with the State Defendants, the State Defendants elected to open an endless sham investigation into Plaintiff Sevier, knowing that it would interfere with his efforts to fight human trafficking and the unconstitutional misconduct of corrupt government actors. In May 2011, Plaintiff Sevier sued the State Defendants for their malicious targeting that was rife with fraud, waste, abuse, and mismanagement. See *Sevier v. Jones*, 3:11-00435 (M.D. Tenn. Aug. 1, 2011). In retaliation, the State Defendants maliciously exploited a reprisal campaign that took place in Iraq, after Plaintiff Sevier attempted to reported Democratic State Representative John Mark Windle to the Inspector General in Mosul for violating Army regulations. See *Sevier v. Windle*, 3:2011-cv-00246 (M.D. T.N. 2011). The State Defendants unlawfully colluded to manipulate the VA to leak confidential Military records in violation of federal law to accomplish ends that were otherwise unobtainable and for purposes that were non-secular. Despite the fact that the State Defendants have cultivated a vast amount of service discrediting misconduct for reasons that are purely egotistical, the State Defendants continue to double down in the facilitation of a series of fake controversies that were invented interfere with the Plaintiffs efforts to pass the Human Trafficking And Child Exploitation Prevention Act and the Marriage And Constitution Restoration Act. See *Penkoski et. al. v. Justice et. al.*, 1:18-cv-00010 (N.D. 2018);; See also *Sevier v. Google et. al.*, 15-cv-05345 (6th Cir. 2015).

82. The State Defendants have engaged in service discrediting misconduct and have violated a litany of Federal laws that cannot be enforced unless President Trump is permitted to fully oversee his Department of Justice.

83. Because the Plaintiffs themselves have been subjected to a non-secular witch hunt, the Plaintiffs have a strong logical nexus to object to their taxpayer dollars being misused to oppress a President who could assist in providing the Plaintiffs with relief if the fake investigation was dissolved.

**CAUSE OF ACTION VIOLATION THE INVESTIGATION VIOLATES THE
FIRST AMENDMENT ESTABLISHMENT CLAUSE**

84. Plaintiff incorporates all allegations previously stated as if set out in full herein and make the following claims against these Defendants. The First Amendment to the United States Constitution provides that “[The government] shall make no law respecting an establishment of religion.” U.S. CONST. amend. I. This provision, among other things, “prohibits government from appearing to take a position on questions of religious belief or from ‘making adherence to a religion relevant in any way to a person’s standing in the political community.’” *County of Allegheny v. ACLU*, 492 U.S. 573, 594 (1989) (quoting *Lynch v. Donnelly*, 465 U.S. 668, 687 (1984)(O’Connor, J., concurring)). The government must “remain secular” and must “not favor religious belief over disbelief.” *Id.* at 610.

85. To pass muster under the Establishment Clause, a government action must satisfy the *Lemon* test, pursuant to which it must: (1) have a valid secular purpose; (2) not have the effect of advancing, endorsing, or inhibiting religion; and (3) not foster excessive entanglement with religion. *Id.* at 592 (citing *Lemon v. Kurtzman*, 403 U.S. 602 (1971)). Government action

“violates the Establishment Clause if it fails to satisfy any of these prongs.” *Edwards v. Aguillard*, 482 U.S. 578, 583 (1987); *Agostini v. Felton*, 521 U.S. 203, 218 (1997).¹⁹

86. The Defendants’ investigation violates the *Lemon* Test because it is a non-secular sham that is excessively entangling the government with the religion of Secular Humanism, cultivating indefensible legal weapons against non-secular humanists, and because it has the effect of excessively entangling the government with the religion of Secular Humanism. The Mueller investigation conveys to Secular Humanists in office that it is ok for government assets to be used to crush an individual who refuses to convert to the Secular Humanist dogma promoted by the DNC adnauseum.

87. The goal of the investigation is not to accomplish neutral and natural justice. The goal of the investigation is to discredit and embarrass the President and his supporters; to create a cloud of impropriety over the Republican party and its supporters; and to cultivate a basis for impeachment because they have a different set of religious values than the Defendants. The investigation is reprisal against the American public by Democrats within the Department of Justice against the American public for not putting Mrs. Clinton in office so that the DOJ and other government entities could continue to terrorize people who think differently than they do with impunity.

88. The Defendants have colluded with the DNC, which actually did collude with Russia in a manner that actually was unlawful. The paramount reasons the Plaintiffs and others elected President was so that Secular Humanists, like the Defendants, could be removed from office for

¹⁹ For public’s sake here is a short video on understanding the Lemon Test. https://youtu.be/_hYslZWsjxA

a lack of actual character fitness. The election of President Trump is a rebuke to the self-entitled careerist who believe that the people work for them and not the other way around.

**THE INVESTIGATION VIOLATES THE PLAINTIFFS' FIFTH AMENDMENT
SUBSTANTIVE DUE PROCESS AND EQUAL PROTECTION CIVIL RIGHTS**

89. Some things are so wrong that even if there is not an official tort name, it speaks for itself.

The Plaintiffs believe that the United States has a written Constitution, not a living one.

However, if there was ever a time for the Court to dip into the wellspring of Substantive Due Process Judicial policy making it is now. The investigation violates the Plaintiffs Substantive Due Process rights under the Fourteenth Amendment because of its collateral harm that is voiding them of equal protection under the law.

90. Not only can the President not properly access his Department of Justice. Neither can the Plaintiffs as long as the President is prevented from being in control of his Department of Justice.

91. The President needs to be in control of the Department Of Justice because there is ongoing pattern of abuse by Secular Humanist to misuse the mental health profession, ethics commissions, and District Attorneys offices that started under President Obama and remains ongoing. This is self-evidently wrong and President Trump was put into office to stop this kind of abuse.

92. Just as (1) Filmmaker Dinesh D'Souza was allegedly subjected to unreasonable prosecution and unnecessary mental health evaluations because he embarrassed President Obama, (2) the Honorable Ruth Neely was wrongfully targeted by Wendy Soto the executive director of the Wyoming Commission on Judicial Conduct & Ethics for opposing Secular Humanism dogma, and (3) Judge Roy Moore was targeted by the Alabama Ethics Commission because he thinks Secular Humanist moral relativism is immoral, the Plaintiffs have been subjected to similar

persecution and the deprivation of civil right because President is not properly being allowed to oversee his Department of Justice.

VIOLATION BY THE STATE DEFENDANTS

93. The First Amendment Establishment Clause applies to the State of Tennessee through the Fourteenth Amendment.

94. The State Defendants are engaging in non-secular targeting to prevent the Plaintiffs from pursuing pro-life litigation, pro-traditional marriage litigation in support of the Marriage And Constitution Restoration Act, and anti-human trafficking litigation in support of the Human Trafficking And Child Exploitation Prevention Act for reasons that fail the Lemon Test and violate the Establishment Clause. The State Defendants' selective morality and enforcement of rules against the Plaintiffs constitutes as non-secular sham that has created an indefensible legal weapon against Christians that has had the effect of excessively entangling the government with the religion of Secular Humanism.²⁰

ELEMENTS OF AN INJUNCTION

95. The Plaintiff has and will suffer and will continue to suffer irreparable harm to his First Amendment constitutional rights as citizens who works in the Federal buildings in question. The Plaintiffs' injuries will be continuing and repeated each day the non-secular investigation permitted to remain in violation of the United States Constitution. "The loss of First Amendment

²⁰ The Due Process Clause of the Fourteenth Amendment of the United States Constitution provides that no "State [shall] deprive any person of life, liberty, or property, without due process of law." U.S. Const Amend XIV, § 1. Individuals are protected by the Due Process Clause from arbitrary government intrusion into life, liberty and property. The Equal Protection Clause provides that no state shall "deny to any person within its jurisdiction the equal protection of the laws." U.S. Const. Amend XIV, § 1. The Fourteenth Amendment's equal protection guarantee embodies the constitutional ideal that "all persons similarly situated should be treated alike." *City of Cleburne v. Cleburne Living Ctr.*, 473 U.S. 432, 439 (1985). Supreme Court rule 9 violates the Fourteenth Amendment because it wrongfully shifts the burden of proof onto the wrong party in a manner that is obstructing justice and harming the Plaintiffs.

freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Elrod v. Burns*, 427 U.S. 347, 373 (1976); *see also, e.g., Pacific Frontier v. Pleasant Grove City*, 414 F.3d 1221, 1235-36 (10th Cir. 2005) (noting presumption of irreparable harm where First Amendment rights are implicated). “A plaintiff suffers irreparable injury when the court would be unable to grant an effective monetary remedy after a full trial because such damages would be inadequate or difficult to ascertain.” *Dominion Video Satellite, Inc. v. EchoStar Satellite Corp.*, 269 F.3d 1149, 1156 (10th Cir. 2001). Furthermore, “[w]hen an alleged constitutional right is involved, most courts hold that no further showing of irreparable injury is necessary.” *Kikumura v. Hurley*, 242 F.3d 950, 963 (10th Cir. 2001).

96. NO ADEQUATE LEGAL REMEDY. Plaintiffs have no adequate remedy at law because legal relief cannot remedy the denial of the Plaintiff’s First Amendment rights. Unless the investigation is terminated, the Plaintiffs rights will remain trampled, relegating them an all Trump supporters to second class citizens and the Defendants intend.

97. BALANCE OF HARM. The balance of harm as to irreparable injury to the Plaintiff in comparison to the “harm” to Defendants weighs in Plaintiffs’ favor. When a policy or investigation result that government officials wish to enact is likely unconstitutional, their interests do not outweigh those of the Plaintiffs in having their Constitutional rights protected. *Awad v. Ziriox*, 670 F.3d at 1132 citing *Coal. for Econ. Equity v. Wilson*, 122 F.3d 692, 699 (9th Cir. 1997).

98. PUBLIC INTEREST. The granting of declaratory and injunctive relief will be in the public interest, in that there is always a public interest in the protection of constitutional rights, especially fundamental rights. “[I]t is always in the public interest to prevent the violation of a

party's constitutional rights." *Awad v. Ziriox*, 670 F.3d at 1132 quoting *G & V Lounge, Inc. v. Mich. Liquor Control Comm'n*, 23 F.3d 1071, 1079 (6th Cir. 1994). ("While the public has an interest in the will of the voters being carried out . . . the public has a more profound and long-term interest in upholding an individual's constitutional rights." *Id.*; see also *Cate v. Oldham*, 707 F.2d 1176, 1190 (10th Cir. 1983) (noting "[t]he strong public interest in protecting First Amendment values").

99. The investigation constitutes an effort to relegate all supporters of President Trump to a second class citizen status. Because the investigation was created for non-secular reasons, if it were to continue and if it were to lead to phony basis to hurt the President in any way whatsoever, America would likely shift from a culture civil war into a violent civil war for cause.

PRAYER FOR RELIEF

In view of the sham investigations, this quote from President Lincoln is fitting:

From whence shall we expect the approach of danger? Shall some trans-Atlantic military giant step the earth and crush us at a blow? Never. All the armies of Europe and Asia...could not by force take a drink from the Ohio River or make a track on the Blue Ridge in the trial of a thousand years. No, if destruction be our lot we must ourselves be its author and finisher. As a nation of free men we will live forever or die by suicide.

WHEREFORE, Plaintiffs incorporate the allegations previously stated and make the following prayer for relief from this Court:

A. Assume jurisdiction of the cause to determine this controversy and set this case down promptly for hearing;

B. Assign this action to the rocket docket and schedule oral argument for a preliminary injunction within 10 days after the Federal Defendants are served;

C. Declare, pursuant to 28 U.S.C. Sec. 2201-02 and Fed. Rul. Civ. Pro. 57, that the Mueller investigation into the Russian probe against the President and any of his authorized agents must be terminated because it is unconstitutional under the Establishment Clause both facially and in application;


D. Enter a temporary injunction and permanent injunction pursuant to Fed. R. Civ. P. 65 requiring Defendants dissolve the Special Counsel investigation because it violates the Establishment Clause of the First Amendment;

E. Pursuant to Rule 54(d) of the Federal Rules of Civil Procedure and 42 U.S.C. Sec. 1988, Plaintiffs should be allowed their costs and attorney fees herein against Defendants as permitted by law.

F Any and all such other and further relief as this Court deems just and equitable against Defendants;

G. Issue a permanent injunction that will enjoin prevent the State Defendants from taking any additional action that interferes with Plaintiffs Sevier's representation of his co-Plaintiffs in Federal District Court actions in view of the Establishment Clause;

L. Provide the Plaintiffs with any other forms of relief that the Court thinks accords with justice.

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